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Bernadino
Cor.

UNION CARBIDE CHEMICALS AND PLASTICS COMPANY INC.

Law Department

39 Old Ridgebury Road
Danbury, CT 06817-0001

September 21, 1989

Robert L. Hollingshead, Esq.
Pitney, Hardin, Kipp & Szuch
163 Madison Avenue
CN 1945
Morristown, NJ 07960-1945

Re: Joan Bernadino, Executrix of Estate of Robert J.
Bernadino v. Union Carbide Corporation

Dear Mr. Hollingshead:

My previous efforts to talk to you over the phone have been unsuccessful.

We had discussed possible settlement and/or trial verdict estimates. Would you please provide me with that information?

I note that the plaintiff is attempting to consolidate the case with the Peterson case. My own thoughts are that keeping them separate is probably more advantageous to us. Therefore, please oppose the effort to consolidate.

Very truly yours,

John R. Downey
John R. Downey

JRD/els

Letter dictated by Mr. Downey; signed and sent in his absence by secretary.

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